



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2

2890 WOODBRIDGE AVENUE  
EDISON, NEW JERSEY 08837-3679

APR - 9 2010

RECEIVED

APR 13 2010

NY/NJ - EDC

**VIA E-MAIL AND CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

Mr. Daniel Kopcow, P.E., PMP  
Project Manager  
Weston Solutions, Inc.  
205 Campus Drive  
Edison, New Jersey 08837

**Re: Hatco Site, Fords, New Jersey**

Dear Mr. Kopcow:

The U.S. Environmental Protection Agency (EPA) has reviewed the August 2009 document entitled "Addendum 3 to the 2005 Consolidated Remedial Action Workplan" (Addendum 3), prepared by Weston Solutions, Inc. (Weston) for the Hatco Site (Site). Based on our review of this document, we have prepared the following comments.

***General Comments***

- **Consistency with Weston's Interim Remedial Measures (IRM) Remedial Action Workplan (RAWP):** Since the time that Addendum 3 was initially submitted to EPA, the Agency has reviewed and approved Weston's IRM RAWP for the removal of light non-aqueous phase liquid (LNAPL). The approved IRM RAWP contains information that is inconsistent with the information provided in Addendum 3 (for example, there are inconsistencies in the cleanup approach and in the sampling of distinct phases). Please confirm that the updated information in the IRM RAWP supersedes the information contained in Addendum 3.
- **The Northeast and Morris Ponds:** Addendum 3 does not specifically address remediation of the Northeast and Morris Ponds (although sampling is planned), and so the Agency's approval of the document will not include these areas.
- **Decontamination:** The decontamination procedures specified in the document do not appear to comply with the requirements of 40 CFR 761.79. Weston must ensure that all decontamination activities are performed in accordance with the Federal PCB regulations.
- **EPEC Polymers, Inc.:** Please provide EPA with an update on the status of discussions with EPEC Polymers, Inc., regarding the cleanup of PCBs found on their property.

***Attachment 1 – Post-Excavation Sampling and Analysis Plan (PESAP)***

- **On-Site Non-LNAPL Contamination Areas and Off-Site Contamination Areas:** Weston is proposing the collection of post excavation samples from each 900 square feet of excavation footprint. EPA believes that collecting one sample from each 400 square feet of excavation footprint is more appropriate for use in these areas. While less stringent than the requirements of 40 CFR Subpart O, this grid size will provide a sufficient level of confidence that the areas are sufficiently remediated.

***Attachment 3 – Quality Assurance Project Plan***

- **Section 3.2.1.2 – Waste Classification Samples:** Please be aware that samples collected for disposal purposes (i.e., to select an appropriate disposal facility) must be collected in-situ (and not from stockpiles).

***Attachment 5 – Hatco Air Monitoring and Odor Control Program***

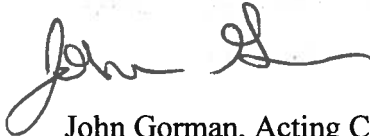
- **Development of Action Levels:** We suggest that a single action level for PCBs in air be developed for use throughout the site. Additionally, please note that the equation for determining the action level in areas of LNAPL uses a PCB concentration of 12,000 mg/kg; however, the Agency has reviewed information indicating that PCB concentrations could be higher than this.

***Attachment 6 – Soil Reuse Proposal***

- **Soil Reuse Sampling Frequency Variance Request:** We reiterate the importance of using in-situ samples (as opposed to samples collected from stockpiles) for determining soil reuse. Weston may not stockpile soil and then sample to determine whether or not it meets the 500 mg/kg criteria (as is proposed on Page 7 of the attachment).

Based on the aforementioned comments, at this time EPA cannot approve Addendum 3. If you have any questions, please feel free to contact James S. Haklar, Ph.D., P.E., of my staff, at 732-906-6817.

Sincerely yours,



John Gorman, Acting Chief  
Pesticides and Toxic Substances Branch

cc: Lynn Vogel, New Jersey Department of Environmental Protection